

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-202-E**

IN RE: Petition of Duke Energy Carolinas, LLC)	
and Duke Energy Progress, LLC for)	INTERVENOR, SOUTH CAROLINA
Approval of CRPE Queue Number)	SOLAR BUSINESS ALLIANCE, INC.'S
Proposal, Limited Waiver of Generator)	FIRST SET OF
Interconnection Procedures, and Request)	INTERROGATORIES
for Expedited Review)	

TO: REBECCA J. DULIN, ESQUIRE, ATTORNEY OF RECORD FOR DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC:

Intervenor, South Carolina Solar Business Alliance, Inc., (hereinafter as, "SCSBA"), pursuant to Reg. 103-835 and Rule 33, of the South Carolina Rules of Civil Procedure, hereby serves, **Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC, ("DEP")**, (hereinafter sometimes referred to together as, "Duke") with Intervenor, South Carolina Solar Business Alliance, Inc.'s First Set of Interrogatories, to be answered separately within twenty (20) days from the date of service hereof. Please set forth Duke's answers separately, after restating the question.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information shall be provided to the undersigned in the format as requested.
2. That all answers to the below Interrogatories shall be labeled using the same numbers as used herein.
3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the answers to these Interrogatories in the appropriate sequence.
4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.
5. That all exhibits be reduced to an 8 1/2" x 11" format.

6. That each Interrogatory be reproduced at the beginning of the answer thereto.
7. If the answer to any Interrogatory is that the information requested is not currently available, state when the information requested will become available.
8. These Interrogatories shall be deemed continuing, so as to require Duke to supplement or amend its responses as any additional information becomes available up to and through the date of trial.
9. If a privilege not to answer an Interrogatory is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.
10. If a refusal to answer an Interrogatory is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.
11. Answer each Interrogatory on the basis of the entire knowledge of Duke, including information in the possession of Duke, or its consultants, representatives, agents, experts, partners, employees, independent contractors and attorneys, if any.
12. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for Duke's inability to answer.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **“You” or “your” shall refer to, Duke.**
2. **The conjunctions “and” and “or” shall be interpreted** in each and every instance as meaning “and/or” and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.
3. **“CPRE”** shall mean the Competitive Procurement of Renewable Energy program authorized by Section 2.(a) of North Carolina H.B. 589, along with all implementing rules and procedures. **“CPRE Project”** shall mean an Interconnection Customer that voluntarily submits a proposal to participate in Tranche 1 of the CPRE, whether or not its bid is selected. **“Non-CPRE Project”** shall mean an Interconnection Customer that does not submit a proposal to participate in Tranche 1 of the CPRE program.

4. **“Document”** shall mean all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in Duke’s possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA’s, Blackberry’s or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of Duke and specifically includes the computer and or laptop computers utilized by Representatives of Duke. Media means media, as broadly as the term “media” may be defined, that contains electronic data, as to the Interaction between SCSBA and Duke.

5. **“Identify” or “identity”** used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the same time in question.

6. **“Identify” or “identity”** used with reference to a writing means to state the date, author, type of document (e.g. letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in Duke’s possession or subject to their control, state what disposition was made of the document(s).

7. **“Interconnection Procedures”** shall mean the South Carolina Generator Interconnection Procedures, Forms, And Agreements For State-Jurisdictional Interconnections approved by the South Carolina Public Service Commission in Docket No. 2015-362-E, Order No. 2016-191 (Apr. 26, 2016).

8. **“The Petition”** shall mean the *Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of CPRE Queue Number Proposal, Limited Waiver of Generator Interconnection Procedures, and Expedited Review* filed in Docket No. 2018-2-E, including Attachment 11 (setting forth the Interdependent Project Review Process for Projects in the Duke Energy Carolinas, LLC and Duke Energy Progress, LLC Interconnection Queues).

9. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

FIRST SET OF INTERROGATORIES

1. Please identify the legal and regulatory standards Duke observes relating to the processing of interconnection requests in South Carolina, including but not limited to provisions standards relating to the timelines for the processing of such requests.

2. Please identify all of Your internal policies, procedures, or guidelines relating to the processing of interconnection requests in South Carolina, including but not limited to provisions standards relating to the timelines for the processing of such requests.

3. How has Duke historically apportioned internal resources between North Carolina and South Carolina for processing interconnection requests? Will that allocation be affected by CPRE implementation in North Carolina and/or South Carolina?

4. Please state the average time that it has taken for Duke to process interconnection requests in South Carolina over the past three years.

5. Please provide data describing the timeline required for every individual project seeking interconnection to Your system in South Carolina to proceed through each stage of the Interconnection process (understanding that any confidential and business proprietary information may be redacted). Please include both projects seeking interconnection to both the transmission and distribution grid in both DEC and DEP.

6. Has Duke complied with the timing requirements for the processing of interconnection requests under the Interconnection Procedures? If not, what are the cause(s) of Duke's non-compliance?

7. How do you define "Reasonable Efforts," as that term is employed in Section 6.1 of the Interconnection Procedures?

8. How do You expect the CPRE to impact the time it takes to process interconnection requests in South Carolina if the Petition is not granted, in whole or in part?

9. How do You expect the CPRE to impact the time it takes to process interconnection requests in South Carolina if the Petition (other than the request for expedited review) is granted, in whole or in part?

10. If the Petition is not granted, in whole or in part, to what extent would QF projects in South Carolina be able to participate in Tranche 1 of the CPRE? Would the evaluation criteria for South Carolina projects under those circumstances differ than the evaluation criteria for North Carolina Projects?

11. If the Petition is granted, in whole or in part, will the CPRE evaluation criteria for South Carolina projects differ than the evaluation criteria for North Carolina Projects?

12. Under the modified interconnection procedures set forth in the Petition (including any related Duke policies or procedures):

- a. Does Duke give any preference, weighting, or other consideration to CPRE projects as compared to non-CPRE projects, in its processing of the interconnection queue? If so, please explain the legal basis for doing so and the practical or technical rationale.
- b. Does Duke give any preference, weighting, or consideration to CPRE projects in South Carolina as compared to CPRE projects in North Carolina in its processing of the interconnection queue? If so, please explain the legal basis for doing so and the practical or technical rationale.
- c. Would CPRE projects proceed through the interconnection process more quickly than non-CPRE projects?
- d. Is it possible that a South Carolina project that is selected for a PPA in Tranche 1 of the CPRE would receive an Interconnection Agreement prior to a project ahead of it in the Interconnection Queue, where the lower-queued project had never been designated as anything other than a Project A under the Interdependent Project Review Process (i.e. the lower-queued project had never been put on hold for interdependency or other reasons). Under what circumstances could this occur?

13. With respect to Your statement in Paragraph 15 of the Petition that your proposal will “ensur[e] that other South Carolina Interconnection Customers queued ahead of the proposed CPRE projects are unaffected”:

- a. Please explain in detail what You mean by “unaffected” in this context, with regard to both distribution and transmission interconnection requests; and
- b. Please explain the basis for this statement.

14. What study(ies) will the “grouping study” described in the Petition consist of? If a CPRE Project that participates in the grouping study is selected for a PPA, would such a project require further System Impact Study before proceeding to Facilities Study?

15. With respect to Your statement in Paragraph 20 of the Petition that “Any Interconnection Customer that does not voluntarily opt to bid into the CPRE Program will maintain its Queue Position and priority for purposes of interconnection study and assignment of Upgrades based upon their preexisting Queue Number”:

- a. Please explain in detail what You mean by “priority for purposes of interconnection study,” and please describe all of Your internal rules, procedures, guidelines, or other policies that pertain to “priority for purposes of interconnection study” with respect to all South Carolina projects; and
- b. Please explain the basis for this statement.

16. With respect to Your statement in Paragraph 25 of the Petition that “successful bidders who proceed to Section 4.4 Facilities Study will be responsible for their proportionate share of assigned costs necessary for completing the system impact grouping studies,” please explain what You mean by “proportionate share of assigned costs necessary for completing the system impact grouping studies,” and describe how such costs are to be allocated.

17. Duke has identified a number of areas within South Carolina that are constrained due to upgrades related to the addition of optical ground wire (“OPGW”). How does Duke determine the need for, and evaluate the priority of, pole infrastructure replacements?

18. Does Duke consider the potential addition of OPGW when determining the need for, or evaluating the priority of, pole infrastructure replacements?

[Signature Page Follows]

/s/Richard L. Whitt

Richard L. Whitt,

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Counsel for Intervenor, South Carolina Solar
Business Alliance, Inc.

September 7, 2018
Columbia, South Carolina